randkarnold1@juno.com>
To: NOSB.Livestock@usda.gov
Date: Fri, 20 May 2005 17:08:09 -0400
Subject: Pasture Guidance Document Comments

National Organic Standards Board
c/o Arthur Neil
Room 4008–South Building
1400 Independence Avenue–SW
Washington, DC, 20250-0001

Dear NOSB Members,

We applaud the NOSB for revising the initial pasture guidance document to include the wording "Ruminant livestock shall graze pasture during the months of the year when pasture can provide edible forage. *The Organic System Plan shall have the goal of providing grazed feed greater than 30% dry matter intake on a daily basis during the growing season but not less than 120 days.* The Organic System Plan shall include a timeline showing how the producer will satisfy the goal to maximize the pasture component of total feed used in the farm system." Having quantifiable minimums will add the clarity that has been missing to have allowed certifiers and operations to interpret the regulation such that organic ruminants, especially lactating dairy cows, are not being grazed and to have allowed the certification of organic dairy operations in climates that are not ecologically conducive for growing either pasture or crops.

We fully support the comments sent to the NOSB by the Northeast Organic Dairy Producers Alliance (NODPA) dated 5/19/2005, specifically:

1) That the NOSB vote in the affirmative for the guidance document with the above numerical parameters.

2) That having grazing system details stated in an operation's Organic System Plan alone will not ensure significant pasture intake—they need to be coupled with the numeric minimums.

3) That the statement "grazed feed must provide a significant portion of the total feed requirements" be reentered in the text as follows:

> A. Organic System Plan
> Ruminant livestock shall graze pasture during the months of the year when pasture can provide edible forage. The grazed feed must provide a significant portion of the total feed requirements. *The Organic System Plan shall have the goal of providing grazed feed greater than 30% dry matter intake on a daily basis during the growing season but not less than 120 days*....

4) That the word "goal" should be taken to allow variance from the minimums in years of significantly abnormal drought or other extreme conditions. Such variance should only be a rare occurrence however.

5) That the NOSB consider the concerns expressed by NODPA relative to using the NRCS Code 528 for appropriate pasture conditions definition.

6) That the NOSB consider endorsing the guidance document as regulation rather than guidance or else closely monitoring the voluntary compliance with the guidance document, with a regulatory approach in mind should the guidance route prove insufficient.

7) That the NOSB strongly consider the desires and expectations of consumers of organic livestock products for they are the final arbiters of this market and whether or not organic regulations are appropriate / strict enough.

Additionally, we would like to offer the attached document as a worksheet that can be used to determine dry matter intake. Our suggestion is that when certifiers question whether an operation is meeting the pasture minimums, the DMI feeding form could be used prior to the grazing season to establish non-grazing season DMI and then during the four months of greatest grazing intake, to determine if the stored feeds fed have indeed decreased by 30% or more during those four months, adjusted for differences in cow numbers. If it has, that would be confirmation that the herd is receiving adequate intake from pasture to meet the minimums.

Thank you, NOSB, for taking the initiative on this very important issue. Please follow through on your great start.

Respectfully,

Richard, Kathie, and Robert Arnold
Twin Oaks Dairy LLC
3175 State Route 13
Truxton, NY 13158-3107

see attachment for DMI worksheet

Farm Name_____ **Date:** _____

Total Daily Milk Lbs.: _____ ÷ _____ **# Cows Milking** = _____ **Lbs. Milk/Cow/Day**

Herd Average Dry Matter Intake (from your farm's charts) [ ]

Avg. Hay lbs. Consumed:	[ ]	x	[ ]	% Dry Matter =	[ ]	Lbs. Dry Matter
Avg. Balage lbs. Consumed:	[ ]	x	[ ]	% Dry Matter =	[ ]	Lbs. Dry Matter
Avg. Haylage lbs. Consumed:	[ ]	x	[ ]	% Dry Matter =	[ ]	Lbs. Dry Matter
Avg. Corn Silage lbs. Consumed:	[ ]	x	[ ]	% Dry Matter =	[ ]	Lbs. Dry Matter
Avg. lbs. consumed Grain # 1:	[ ]	x	[ ]	% Dry Matter =	[ ]	Lbs. Dry Matter
Avg. lbs. consumed Grain # 2:	[ ]	x	[ ]	% Dry Matter =	[ ]	Lbs. Dry Matter
Avg. lbs. consumed Grain # 3:	[ ]	x	[ ]	% Dry Matter =	[ ]	Lbs. Dry Matter
Avg. lbs. consumed Grain # 4:	[ ]	x	[ ]	% Dry Matter =	[ ]	Lbs. Dry Matter

Example: if Dry Matter % is 54, enter .54

[ ]

Estimated Pasture Dry Matter Intake by Subtraction Method

(Subtract any entries from herd average DM intake)